



**Santa Barbara County
Air Pollution Control District**

Part 70 Minor Permit Modification 12389-01
and
Permit to Operate 12398-01

EQUIPMENT OWNER:

Celite Corporation

205129

EQUIPMENT OPERATOR:

Celite Corporation

EQUIPMENT LOCATION:

2500 Miguelito Rd, Lompoc

STATIONARY SOURCE/FACILITY:

Celite Corporation

SSID: 01735

FID: 00012

AUTHORIZED MODIFICATION:

This permit authorizes the following modification to Permit to Operate PTO 12398 issued for the operation of bagging and packing equipment.

- Increase the maximum bag packing rate from each of the packers PK122A (APCD Dev No 109822) and PK122B (APCD Dev No 109823) from 15 dry short tons per hour to 23 dry short tons per hour.

EQUIPMENT DESCRIPTION:

This permit authorizes the operation of bagging and packaging equipment. The equipment subject to this permit is listed in the Equipment List section of this permit.

PROJECT/PROCESS DESCRIPTION:

Celite currently mines and processes diatomaceous earth (DE) at its Lompoc Plant. Celite operates four product lines (3, 5, 6, and 7 Systems) each with “wet end” and “dry end” processing. Wet diatomaceous earth crude is surface mined, crushed, milled and dried and/or calcined at high

temperatures. The dried product is classified into a variety of grades and transported to the bagging and packing area via product line tie-ins of specified product bulk bins from Systems 3, 5, 6 and 7 processing lines. The equipment under this permit is used in the packaging and shipping of finished product that is bagged or bulk loaded for shipment to distributors and customers. The Celite Facility ID is 00012 and the Stationary Source ID is 1735.

CONDITIONS:

Condition 9.C.2 and 9.D.1 below supersede condition 9.C.2 and 9.D.1 of Permit to Operate 12398 issued 07/08/2008. All other conditions in PTO 12398 remain unchanged and in full force.

C.2. **Operating Limitations.** The equipment permitted herein is subject to the following operational restrictions:

- a. Bagging/Semi-Bulk Packing Rate: Bag packing rate from each of the packers PK122A and PK122B (APCD Dev No.s 109822 and 109823) shall not exceed 23 dry short tons per hour (20.9 metric tons/hr). The semi-bulk bag packing rate from each of the semi-bulk bag packers SB132A and SB132B (APCD Dev No.s 110526 and 110527) shall not exceed 13.2 dry short tons per hour (12 metric tons/hr).
- b. Enclosed Equipment: All product processing, handling, storage, and packaging equipment permitted herein shall be completely enclosed with any particulate effluent vented to a permitted baghouse.
- c. Visible Emissions: Fugitive emissions from equipment permitted herein shall not exceed 10% opacity. No visible fugitive emissions shall be emitted from any building or structure enclosing this permitted equipment. Compliance with this condition shall be based on the monitoring conditions of this permit.
- d. Baghouse Stack Flow Rate: The air flow from each baghouse shall not exceed the corresponding exhaust flow rate (scfm) specified in Table 5.
- e. Baghouse Pressure Drop: Except during startup operations (defined for a negative pressure baghouse as powering up the exhaust blower and ending with the pressure drop across the baghouse reaching steady state or when the elapsed time since powering up of baghouse blower reaches 3 hours, whichever is sooner), the baghouse pressure drop across the Packing Station baghouse shall remain between 0.1 and 6 inches H₂O when operating. Compliance with this condition shall be based on the monitoring and recordkeeping conditions of this permit.
- f. Bin Vent Pressure Drop: The pressure drop across each positive pressure baghouse (bin vent) controlling packer bin emissions shall remain between 0.1 and 6 inches H₂O when filling the bins or recirculating product from the semi-bulk bag packer. Compliance with this condition shall be based on the monitoring and recordkeeping conditions of this permit.

- g. Visible Emissions: Baghouse stack emissions shall not exceed 7% opacity.

9.D APCD-Only Conditions

D.1 **Permit Activation.** All aspects of this permit are enforceable by the APCD and the State of California upon the issuance date stamped below. The Part 70 aspects of this permit are not final until:

- (a) The USEPA has provided written comments to the APCD and these comments require no modification to this permit. The APCD will issue a letter stating that this permit is a final Part 70 permit. The effective date that this permit will be considered a final Part 70 permit will be the date stamped on the APCD's letter.
- (b) After the USEPA has provided the APCD written comments that require a modification to this permit, the APCD will modify this permit to address the USEPA's comments and issue the Part 70 permit as final. The re-issued permit will supersede this permit in its entirety.

AIR POLLUTION CONTROL OFFICER

Date

Note:

1. Next Reevaluation Due: March 2010

Attachment: Permit Evaluation for PTO No. 12398

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Table
Equipment List

PTO 12398 / FID: 00012 Celite Corporation / SSID: 01735

A PERMITTED EQUIPMENT

1 Packing Station Baghouse

<i>Device ID #</i>	110525	<i>Device Name</i>	Packing Station Baghouse
<i>Rated Heat Input</i>		<i>Physical Size</i>	14259.00 scf/Minute
<i>Manufacturer</i>	Donaldson	<i>Operator ID</i>	BH125
<i>Model</i>	DLMC 4/5/15	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	BH125 contains 200 bags (each approx 20in D X 5ft L); del p = 0.1 - 6 in WC; neg pressure; rating of blower (Celite ID BL125) = 30 HP; blower flow rate = 14,259 scfm; a/c ratio = 4.41; op temp = 60F		

2 Semi Bulk Bag Filler

<i>Device ID #</i>	110526	<i>Device Name</i>	Semi Bulk Bag Filler
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	Stone Container Corp	<i>Operator ID</i>	SB132A
<i>Model</i>	MBS-1000	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	Bagging rate = 13.2 short tons/hour (12 mt/hr)		

3 Semi Bulk Bag Filler

<i>Device ID #</i>	110527	<i>Device Name</i>	Semi Bulk Bag Filler
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	Stone Container Corp	<i>Operator ID</i>	SB132B
<i>Model</i>	MBS-1000	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	Bagging rate = 13.2 short tons/hour (12 mt/hr)		

4 Packer Bin (BN121A) Baghouse

<i>Device ID #</i>	110528	<i>Device Name</i>	Packer Bin (BN121A) Baghouse
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	Donaldson	<i>Operator ID</i>	BH121A1
<i>Model</i>	DLMV 30/15	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device</i>	BH121A1 contains 20 bags (each approx 20 in D X 5 ft L); del p = 0.1 - 6 in WC;		
<i>Description</i>	positive pressure; air flow 1031 scfm, a/c ratio = 3.2; op temp = 60F.		

5 Packer Bin (BN121A) Baghouse

<i>Device ID #</i>	110529	<i>Device Name</i>	Packer Bin (BN121A) Baghouse
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	Donaldson	<i>Operator ID</i>	BH121A2
<i>Model</i>	DLMV 30/15	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device</i>	BH121A2 contains 20 bags (each approx 20 in D X 5 ft L); del p = 0.1 - 6 in WC;		
<i>Description</i>	positive pressure; air flow 1031 scfm, a/c ratio = 3.2; op temp = 60F.		

6 Packer Bin (BN121B) Baghouse

<i>Device ID #</i>	110530	<i>Device Name</i>	Packer Bin (BN121B) Baghouse
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	Donaldson	<i>Operator ID</i>	BH121B1
<i>Model</i>	DLMV 30/15	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device</i>	BH121B1 contains 20 bags (each approx 20 in D X 5 ft L); del p = 0.1 - 6 in WC;		
<i>Description</i>	positive pressure; air flow 1031 scfm, a/c ratio = 3.2; op temp = 60F.		

7 Packer Bin (BN121B) Baghouse

<i>Device ID #</i>	110531	<i>Device Name</i>	Packer Bin (BN121B) Baghouse
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	Donaldson	<i>Operator ID</i>	BH121B2
<i>Model</i>	DLMV 30/15	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device</i>	BH121B2 contains 20 bags (each approx 20 in D X 5 ft L); del p = 0.1 - 6 in WC;		
<i>Description</i>	positive pressure; air flow 1031 scfm, a/c ratio = 3.2; op temp = 60F.		

8 Packer Bin (BN131A) Baghouse

<i>Device ID #</i>	110532	<i>Device Name</i>	Packer Bin (BN131A) Baghouse
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	Donaldson	<i>Operator ID</i>	BH131A1
<i>Model</i>	DLMV 30/15	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device</i>	BH131A1 contains 20 bags (each approx 20 in D X 5 ft L); del p = 0.1 - 6 in WC;		
<i>Description</i>	positive pressure; air flow 1031 scfm, a/c ratio = 3.2; op temp = 60F.		

9 Packer Bin (BN131A) Baghouse

<i>Device ID #</i>	110533	<i>Device Name</i>	Packer Bin (BN131A) Baghouse
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	Donaldson	<i>Operator ID</i>	BH131A2
<i>Model</i>	DLMV 30/15	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device</i>	BH131A2 contains 20 bags (each approx 20 in D X 5 ft L); del p = 0.1 - 6 in WC;		
<i>Description</i>	positive pressure; air flow 1031 scfm, a/c ratio = 3.2; op temp = 60F.		

10 Packer Bin (BN131B) Baghouse

<i>Device ID #</i>	110534	<i>Device Name</i>	Packer Bin (BN131B) Baghouse
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	Donaldson	<i>Operator ID</i>	BH131B1
<i>Model</i>	DLMV 30/15	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device</i>	BH131B1 contains 20 bags (each approx 20 in D X 5 ft L); del p = 0.1 - 6 in WC;		
<i>Description</i>	positive pressure; air flow 1031 scfm, a/c ratio = 3.2; op temp = 60F.		

11 Packer Bin (BN131B) Baghouse

Device ID #	110535	Device Name	Packer Bin (BN131B) Baghouse
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	Donaldson	<i>Operator ID</i>	BH131B2
<i>Model</i>	DLMV 30/15	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device</i>	BH131B2 contains 20 bags (each approx 20 in D X 5 ft L); del p = 0.1 - 6 in WC;		
<i>Description</i>	positive pressure; air flow 1031 scfm, a/c ratio = 3.2; op temp = 60F.		

12 Blower

Device ID #	110536	Device Name	Blower
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>		<i>Operator ID</i>	BL125
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device</i>	Serving BH125 (Dev No 110525); HP rating = 30 HP		
<i>Description</i>			

13 Blower

Device ID #	110537	Device Name	Blower
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>		<i>Operator ID</i>	BL 132
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device</i>	Serving Semi Bulk Bag Fillers SB132A and B (Dev Nos 110526 & 110527); HP		
<i>Description</i>	rating = 3 HP		

14 Bag Packer

Device ID #	109822	Device Name	Bag Packer
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	Haver	<i>Operator ID</i>	PK122A
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device</i>	Bagging Capacity = 23 short tons/hr (20.7 mt/hr); packing units = 50 pound bags		
<i>Description</i>			

15 Bag Packer

Device ID #	109823	Device Name	Bag Packer
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	Haver	<i>Operator ID</i>	PK122B
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	Bagging Capacity = 23 short tons/hr (20.7 mt/hr); packing units = 50 pound bags		

16 Packer Bin

Device ID #	109824	Device Name	Packer Bin
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>		<i>Operator ID</i>	BN121A
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	Capacity = 4.4 short tons (4 mt) serving bag packer PK122A (Dev No 109822)		

17 Packer Bin

Device ID #	109825	Device Name	Packer Bin
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>		<i>Operator ID</i>	BN121B
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	Capacity = 4.4 short tons (4 mt) serving bag packer PK122B (Dev No 109823)		

18 Semi Bulk Packer Bin

Device ID #	109828	Device Name	Semi Bulk Packer Bin
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>		<i>Operator ID</i>	BN131A
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	Capacity = 4.4 short tons (4 mt) serving semi-bulk bag filler SB132A (Dev No 110526)		

19 Semi Bulk Packer Bin

<i>Device ID #</i>	109829	<i>Device Name</i>	Semi Bulk Packer Bin
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>		<i>Operator ID</i>	BN131B
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device</i>	Capacity = 4.4 short tons (4 mt) serving semi-bulk bag filler SB132B (Dev No		
<i>Description</i>	110527)		



PERMIT EVALUATION for
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1.0 BACKGROUND

- 1.1 General: Celite currently mines and processes diatomaceous earth (DE) at its Lompoc Plant. Celite operates four product lines (3, 5, 6, and 7 Systems) each with “wet end” and “dry end” processing. Wet diatomaceous earth crude is surface mined, crushed, milled and dried and/or calcined at high temperatures. The dried product is classified into a variety of grades and transported to the bagging and packing area via product line tie-ins of specified product bulk bins from Systems 3, 5, 6 and 7 processing lines. The equipment under this permit is used for the packaging and shipping of finished product that is e bagged or bulk loaded for shipment to distributors and customers. The Celite Facility ID is 00012 and the Stationary Source ID is 1735.
- 1.2 Project Description: PTO 12398 was issued July 8, 2008, for the operation of the bagging and packing plant. This permit specified a packing limitation of 15 dry short tons per hour for the paper bag packers. Celite’s goal was to maintain an average of 15 dry short tons per hour for each packer. This proved to be impossible with the previous maximum packing rate. On October 8, 2008, Celite applied to increase the throughput on each of the Haver packers to 23 dry short tons per hour in order to meet the desired average packing rate of 15 dry short tons per hour. The emissions from this increase in packing will be controlled by the current emissions controls installed in the packing plant. It was determined that the permitted baghouses are sufficiently sized, and that no emissions increases would occur due to the increased throughputs (see section 2.2 below for more details).
- 1.3 Compliance/SCDP: The bagging and packing plant was inspected during SCDP and found in compliance with the terms and conditions of ATC 12398. Source testing of the following baghouses was conducted on the dates noted in accordance with the SCDP and source testing conditions of ATC 12398: BH125 (3-28-08), BH121A1 (3-27-08), BH121A2 (3-27-08), BH121B1 (3-27-08), BH121B2 (3-26-08), BH131B1 (4-24-08) and BH131B2 (4-24-08). All tested baghouses were found in compliance with the PM and PM10 emission limits in ATC 12398

2.0 ENGINEERING ANALYSIS

- 2.1 Equipment/Processes: Project product transfer equipment are powered by electric motors, therefore, the only potential project emissions are particulates. Product is packaged into 50 pound bags by bag packers PK122A and B. Semi-bulk bags (27 cubic feet weighing between 600 and 1100 lbs depending on product density) are filled by semi-bulk packers SB 131A and B. The packers are fed by dedicated packer bins. The baghouses control particulate emissions from filling of the packer bins and from bag loading operations at bag packers PK122A and B and semi-bulk bag packers SB131A and B.

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To evaluate whether the increase in packing rate (approximately 53%) would impact the baghouse control performance, the APCD discussed the design and sizing with baghouse manufacturer Donaldson Torit. As part of this evaluation, Celite obtained inlet grain loading measurements for BH125 (a control device for the Haver Packers) and provided these to Donaldson. The inlet grain loading was found to be significantly lower (roughly 10 times) than the 5 grains/dscf inlet loading upon which Donaldson's original emissions guarantee was based. This indicates that BH 125 was properly sized to handle the proposed increase in packing. In addition, Donaldson was also able to confirm that the binvent baghouses were properly sized and designed to handle the increase in packing rate with no change in emissions. The ongoing monitoring required by the Baghouse I&M Plan, along with annual source testing will provide ongoing checks for emission control performance.

- 2.2 Emission Controls: The baghouse control devices installed on the packer bins are Donaldson Model 30/15 passive baghouses that do not contain a blower and will operate under positive pressure created from air displacement and product transport during each bin filling operation. The entire system is enclosed and all effluent is vented through the baghouse. Each packer bin contains two Donaldson DLMV 30/15 baghouses each with a maximum air flow of 1031 scfm. The particulate control device on bag packers PK122A and B is the Packing Station baghouse BH125 which is a Donaldson Model DLMLC 4/5/15 negative pressure baghouse with a 30 HP blower producing a maximum air flow of 14,259 scfm. These control devices have been sized to properly handle the increase in packing permitted herein with no change in airflows or efficiencies to ensure no increase in emissions.

These baghouses are designed to limit the particulate matter concentration in the exhaust to atmosphere to a level not to exceed 0.005 grains per dry standard cubic foot (gr/dscf). Pressure drop across each baghouse will be maintained between 0.1 to 6 inches of water when operating.

- 2.3 Emissions: Potential PM/PM₁₀ emissions from the Donaldson baghouses are based on the maximum rated airflow. The baghouse exhaust blower air flow rating for the negative pressure Packing Station baghouse was originally permitted at 11,000 scfm however, based on source test data gathered during SCDP, the air flow rate is increased to 14,295 scfm. The maximum air flow produced by the packer bin filling operation through each passive baghouse is permitted at 1031 scfm. The guaranteed outlet grain loading concentration (0.005 gr/dscf) and an operating schedule of 8,760 hours per year applies to all project baghouses. The general equation for particulate matter emissions is:

$$E_{(lb/day)} = EF_{(gr/scf)} \times Q_{(scf/min)} \times 1440_{(min/day)} / 7000_{(gr/lb)}$$
$$E_{(ton/yr)} = EF_{(gr/scf)} \times Q_{(scf/min)} \times 60_{(min/hr)} \times 8760_{(hr/yr)} / 7000_{(gr/lb)} / 2000_{(lb/ton)}$$

where: E = mass emission rate
EF = emission factor
Q = exhaust flow rate

The grain loading concentration is a guaranteed limit provided by the manufacturer. A copy of the vendor guarantees is located in the project file. For permitting purposes, Celite has assumed that the PM/PM₁₀ ratio is 1:1.

Based on the above baghouse operating and design parameters, the permitted emission limits are

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listed in permit condition 1 of this permit. Source testing shall be conducted to verify the grain loading concentrations, air flow rate and mass emissions.

- 2.4 Reasonable Worst Case Emission Scenario: 24 hours per day and 8,760 hours per year.
- 2.5 Special Calculations: There are no special calculations.
- 2.6 BACT Analyses: The product packing station project did not exceed the Rule 802 25 lb/day BACT threshold for PM/PM₁₀ emissions however these packing stations are a part of the System 7 modification that is permitted under ATC 12105. BACT is required on all equipment that is part of the System 7 modification. The PM/PM₁₀ control technology and emission standard of 0.005 gr/dscf and the transport and handling of product within an enclosed system controlled by a baghouse proposed by Celite for this project meets the current APCD definition of BACT.
- 2.7 Enforceable Operational Limits: The permit has enforceable operating conditions to ensure compliance with APCD rules and regulations.
- 2.8 Monitoring Requirements: This permit requires the monitoring of the pressure drop across the baghouse. The permitted pressure drop range is 0.1-6 inches of water column as listed in permit condition 2. These data points were verified during SCDP per the Baghouse Inspection and Maintenance Plan approved on March 5, 2008. Periodic source testing is also required.
- 2.9 Recordkeeping and Reporting Requirements: The permit requires that specific data be recorded and reported to the APCD.

3.0 REEVALUATION REVIEW (not applicable)

4.0 REGULATORY REVIEW

- 4.1 Partial List of Applicable Rules: This project is anticipated to operate in compliance with the following rules:

- Rule 101. Compliance of Existing Facilities
- Rule 205. Standards for Granting Permits
- Rule 302. Visible Emissions
- Rule 303. Nuisance
- Rule 304. Particulate Matter - Northern Zone
- Rule 306. Dust and Fumes - Northern Zone
- Rule 309. Specific Contaminants
- Rule 505. Breakdown Procedures
- Rule 801. New Source Review
- Rule 802. Nonattainment Review
- Rule 803. Prevention of Significant Deterioration

- 4.2 40 CFR Part 60 {New Source Performance Standards}: Subpart OOO applies to nonmetallic mineral processing plant crushers, grinding mills, screening operations, bucket elevators, belt conveyors, bagging operations, storage bins and enclosed truck or rail car loading stations constructed, reconstructed or modified, as defined by the standard, after August 31, 1983. The product packer bins and packer units are an integral part of a nonmetallic mineral processing plant

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operation and are subject to Subpart OOO. As related to this permit, the Subpart OOO emission requirements are: (1) an exhaust emission limit of 0.022 gr/dscf, (2) a stack opacity limit of 7%, and (3) fugitive emissions from facility equipment not to exceed 10% opacity or no visible fugitive emissions emitted from the building enclosing these operations. Emissions from the baghouse are limited to 0.005 grains/dscf in permit condition #1, and thus will comply with Subpart OOO item #1 above. , Ongoing periodic monitoring has been included for determining compliance with APCD Rule 302 opacity limits, consistent with Part 70 permit 5840.

- 4.3 NEI Calculations: The net emission increase calculation is used to determine whether certain requirements must be applied to a project (e.g., offsets, AQIA, PSD BACT). There is no increase to the stationary source NEI as a result of this permit modification.

5.0 AQIA

The project is not subject to the Air Quality Impact Analysis requirements of Regulation VIII.

6.0 OFFSETS/ERCs

- 6.1 General: The NEI particulate emission offset threshold of 80 lbs/day in Regulation VIII is not exceeded for this permitting action.
- 6.2 Offsets: Offsets are not triggered by this permitting action (see 6.1 above).
- 6.3 ERCs: This source does not generate emission reduction credits (see 6.1 above).

7.0 AIR TOXICS

Based on the 1994 toxic emissions inventory for the Lompoc plant, cancer and non-cancer toxics risks off the property were estimated to be below the APCD's AB2588 significance thresholds.

8.0 CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) REVIEW

This project is exempt from CEQA pursuant to the Environmental Review Guidelines for the Santa Barbara County APCD (revised November 16, 2000). Appendix A.1 (*APCD Projects Exempt from CEQA*) specifically exempts Permits to Operate. No further action is necessary.

9.0 SCHOOL NOTIFICATION PROCESS

A school notice pursuant to the requirements of H&SC §42301.6 was not required.

10.0 PUBLIC and AGENCY NOTIFICATION PROCESS

This project was not subject to public notice. Celite submitted comments on the draft PTO Mod on October 14, 2008. The APCD responses to those comments appear in Attachment A of this permit.

11.0 FEE DETERMINATION

Fees for the APCD's work efforts are assessed on a cost reimbursement basis. The Project Code is 205129.

ATTACHMENT D

APCD Response to Comments

The following is the APCD response to comment on the draft permit by Celite in the letter dated October 14, 2008:

Celite Comment: Engineering Evaluation, Page 1, Section 1.3. Celite notes that the last sentence of this section references an airflow increase associated with PTO 12398-01. Celite has not received any IDS and NEI tables with this draft PTO 12398-01.

APCD Response: This sentence was a piece of text from the original PTO 12398 for the bagging and packing station describing a permitted airflow increase from the permitted level in the ATC 12398. This text has been removed. It is noted that there is no airflow increase associated with this permit action, and no NEI increase.